

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
KNEPPER & CLARK LLC
10040 W. Cheyenne Ave., Suite 170-109
Las Vegas, NV 89129
Phone: (702) 825-6060
FAX: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

Sean N. Payne, Esq.
Nevada Bar No. 13216
PAYNE LAW FIRM LLC
9550 S. Eastern Ave., Suite 253-A213
Las Vegas, NV 89123
Phone: (702) 952-2733
FAX: (702) 462-7227
Email: seanpayne@spaynelaw.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KIMBERLY J. RICHARD and JEFFREY L.
RICHARD,

Case No. 2:18-cv-00665-JAD-PAL

Plaintiffs.

V.

EXPERIAN INFORMATION SOLUTIONS,
INC., EQUIFAX INFORMATION
SERVICES, LLC, and TRANS UNION LLC,

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTION TO DISMISS**

[THIRD REQUEST]

Defendants.

28

1 Plaintiffs Kimberly J. Richard and Jeffrey L. Richard (“Plaintiffs”) and Defendants Trans
2 Union LLC (“Trans Union”), Experian Information Solutions, Inc. (“Experian”), and Equifax
3 Information Services, LLC (“Equifax”) (collectively, the “Parties”), by and through their counsel
4 of record, have agreed to stipulate to the following:

5 1. On April 13, 2018, Plaintiffs filed their Complaint. (ECF No. 1)
6 2. On June 28, 2018, Trans Union filed a Motion to Dismiss Plaintiffs’ Complaint.
7 (ECF No. 13).

8 3. On July 11, 2018, Plaintiffs filed a first request for an extension of time to respond
9 to Trans Union’s Motion to Dismiss through July 26, 2018 (ECF No. 15), which was granted by
10 the Court through its Order entered July 12, 2018. (ECF No. 16).

11 4. On July 25, 2018, the Parties filed a second request to extend Plaintiffs’ time to
12 respond to Trans Union’s Motion to Dismiss through August 9, 2018 (ECF No. 20), which was
13 granted by the Court through its Order entered July 26, 2018. (ECF No. 21).

14 5. Plaintiffs and Trans Union have had several additional communications regarding
15 the allegations and evidence relevant to Plaintiffs’ claims against Trans Union, are continuing to
16 work in good faith towards a potential resolution, and respectfully request one additional week to
17 continue their negotiations. Accordingly, the Parties hereby request the Court to further extend
18 the date for Plaintiffs to respond to Trans Union’s Motion to Dismiss Plaintiffs’ Complaint through
19 and including **August 16, 2018**.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 This is the third request for an extension of this deadline, and is not made for purposes of delay.

2 **IT IS SO STIPULATED.**

3 Dated August 8, 2018

/s/ Miles N. Clark Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 KNEPPER & CLARK LLC	/s/ Jason G. Revzin Jason G. Revzin, Esq. Nevada Bar No. 8629 LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Blvd., Suite 600 Las Vegas, Nevada 89118
Sean N. Payne, Esq. Nevada Bar No. 13216 PAYNE LAW FIRM LLC	<i>Attorneys for Defendant Trans Union LLC</i>
David H. Krieger, Esq. Nevada Bar No. 9086 HAINES & KRIEGER, LLC	
<i>Attorneys for Plaintiffs</i>	
/s/ Bradley T. Austin Bradley T. Austin, Esq. Nevada Bar No. 13064 SNELL & WILMER LLP 3883 Howard Hughes Pkwy, Suite 1100 Las Vegas, NV 89169	/s/ Andrew J. Sharples Jennifer L Braster, Esq. Nevada Bar No. 9982 Andrew J. Sharples, Esq. Nevada Bar No. 12866 NAYLOR & BRASTER 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145
<i>Attorneys for Defendant Equifax Information Services LLC</i>	<i>Attorneys for Defendant Experian Information Solutions, Inc.</i>

19 **ORDER**

20 **IT IS SO ORDERED.**

21 Dated: August 8, 2018.

22 
UNITED STATES DISTRICT JUDGE

23
24
25
26
27
28